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Attorneys for Plaintiff Ricardo J. Cantos

RICARDO J. CANTOS,

Plaintiff(s),

v.

ROBERTO GUTIERRIZ-GOMEZ,

ELIZABETH TRANSPORT LLC., “JOHN

DOES 1-10” (fictitious names, true names

unknown), and/or “ABC CORPORATIONS 1-10”

(fictitious names, true names unknown),

Defendant(s).

: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION: MIDDLESEX COUNTY
:

: DOCKET NO.: MID-L-

: Civil Action

: **COMPLAINT**

Plaintiff, **RICARDO J. CANTOS**, residing at 351 North 5th Street in the City of Newark, County of Passaic and State of New Jersey, complaining of the Defendants, **ROBERTO GUTIERRIZ-GOMEZ, ELIZABETH TRANSPORT LLC., “JOHN DOES 1-10”** (fictitious names, true names unknown), and/or “ABC CORPORATIONS 1-10” (fictitious names, true names unknown), deposes and says:

FIRST COUNT

1. On or about September 3, 2020, Plaintiff, **RICARDO J. CANTOS**, was the operator of the certain 2020 Kenworth T880 Tractor Trailer which was stopped in the shoulder alongside New Jersey Turnpike INT 13 TN ramp in the City of Elizabeth, County of Union and State of New Jersey.

2. On or about September 3, 2020, Defendant, **ROBERTO GUTIERRIZ-GOMEZ**, was the operator of the certain 2015 Volvo Truck Trailer which was traveling northbound on New Jersey Turnpike INT 13 TN ramp in the City of Elizabeth, County of Union and State of New Jersey.

3. On or about September 3, 2020, Defendant, **ELIZABETH TRANSPORT LLC.**, was the owner of the certain 2015 Volvo Truck Trailer which was traveling northbound on New Jersey Turnpike INT 13 TN ramp, in the City of Elizabeth, County of Union and State of New Jersey.

4. On or about September 3, 2020, Defendant, **ROBERTO GUTIERRIZ-GOMEZ**, was acting as the agent of Defendant, **ELIZABETH TRANSPORT LLC.**, the owner of the certain 2015 Volvo Truck Trailer which was traveling northbound on New Jersey Turnpike INT 13 TN ramp, in the City of Elizabeth, County of Union and State of New Jersey.

5. Defendants JOHN DOES 1-10 and/or ABC CORPORATIONS 1-10, are designated as the unknown owner, operator, employer, principal, or agent of the certain 2015 Volvo Truck Trailer which was traveling northbound motor on New Jersey Turnpike INT 13 TN ramp, in the City of Elizabeth, County of Union and State of New Jersey.

6. Defendants, **ROBERTO GUTIERRIZ-GOMEZ, ELIZABETH TRANSPORT LLC.**, “JOHN DOES 1-10” (fictitious names, true names unknown), and/or “ABC CORPORATIONS 1-10” (fictitious names, true names unknown), did so negligently and carelessly own, operate, and/or maintain the aforementioned motor vehicle so as to cause or contribute to the collision with the vehicle of Plaintiff, **RICARDO J. CANTOS**.

7. As a direct and proximate result of the negligence of the Defendants, **ROBERTO GUTIERRIZ-GOMEZ, ELIZABETH TRANSPORT LLC.**, as well as JOHN DOES 1-10 and/or ABC CORPORATIONS 1-10, fictitious names as aforesaid, Plaintiff, **RICARDO J. CANTOS** was caused to sustain and did sustain serious and permanent personal injuries requiring the care and treatment of physicians, hospitalization, and medication, and have been and will in the future continue to be hampered in his daily routines.

WHEREFORE, Plaintiff, **RICARDO J. CANTOS**, demands judgment against Defendants, **ROBERTO GUTIERRIZ-GOMEZ, ELIZABETH TRANSPORT LLC**, “JOHN DOES 1-10” (fictitious names, true names unknown), and/or “ABC CORPORATIONS 1-10” (fictitious names, true names unknown), in the amount of his damages together with interest and costs of suit.

LYNCH LYNCH HELD ROSENBERG, P.C.

Attorneys for Plaintiff Ricardo J. Cantos

A handwritten signature in black ink, reading "Paul LaSalle". The signature is written in a cursive, flowing style.

By: _____
Paul L. LaSalle, Esq.

Dated: August 4, 2022

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a Trial by jury as to all issues.

NOTICE OF TRIAL COUNSEL

Please take notice that Paul L. LaSalle, Esq. is hereby designated as Trial Counsel in the above-captioned matter for Lynch Lynch Held Rosenberg, P.C., pursuant to R. 4:25 et. seq.

DEMAND FOR ANSWERS TO UNIFORM INTERROGATORIES

PLEASE TAKE NOTICE that pursuant to R. 4:17-1(b)(2), Plaintiff hereby demands answers to **Uniform Interrogatories Form C and Form C(1)** within sixty (60) days of the service of Defendant's Answer to this Complaint.

CERTIFICATION

Pursuant to the requirements of Rule 4:5-1 (NOTICE OF OTHER ACTIONS), I, the undersigned, do hereby certify to the best of my knowledge, information and belief, that except as hereinafter indicated, the subject matter of the controversy referred to in the within pleading is not the subject of any other Cause of Action, pending in any other Court, or of a pending Arbitration Proceeding, nor is any other Cause of Action or Arbitration Proceeding contemplated.

1. OTHER ACTIONS PENDING?..... YES _____ NO X
A. If YES - Parties to other Pending Actions.
B. In my opinion, the following parties should be joined in the within pending Cause of Action.
2. OTHER ACTIONS CONTEMPLATED?..... YES _____ NO X
A. If YES - Parties contemplated to be joined, in other Causes of Action.
3. ARBITRATION PROCEEDINGS PENDING?..... YES _____ NO X
A. If YES - Parties to Arbitration Proceedings.
B. In my opinion, the following parties should be joined in the pending Arbitration Proceedings.
4. OTHER ARBITRATION PROCEEDINGS CONTEMPLATED?..... YES _____ NO X
A. If YES - Parties contemplated to be joined to Arbitration Proceedings.

In the event that during the pendency of the within Cause of Action, I shall become aware of any change as to any facts stated herein, I shall file an amended certification and serve a copy thereof on all other parties (or their attorneys) who have appeared in said Cause of Action.

LYNCH LYNCH HELD ROSENBERG, P.C.

Attorneys for Plaintiff Ricardo J. Cantos



By: _____
Paul L. LaSalle, Esq.

Dated: August 4, 2022